



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
<http://www.epa.gov/region08>

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December 27, 2002

Ref: 8EPR-SR

Mr. Dean Costlow
PO Box 523
Libby, MT 59923

Dear Mr. Costlow:

Paul Peronard provided me your letter and asked me to respond directly to you. My name is Jim Christiansen, and I will be the project manager for the EPA Superfund investigation and cleanup of Libby. If my memory is accurate, I think we've spoken on the phone once before early in 2003. I'm aware you've spoken to Paul, Duc Nguyen, and Courtney Zamora as well. I'm sure this process is frustrating but I will do my best to provide you good answers and address your concerns.

Your recent letter to Paul indicated that you have concerns with vermiculite under and around your house at 610 Dakota Ave. Specifically, you have a need to work under the house (e.g. a dirt floor basement, etc) to repair some portions of the your foundation, plumbing, and electrical system. You have removed some of the visisble vermiculite material and placed it outdoors around your house. Based on your situation, I think there are two primary issues here:

1. What cleanup does EPA feel is required for this particular situation, and how and when will it be conducted?
2. What are the health risks of working in vermiculite/asbestos prior to cleanup and how can I address them?

Obviously, these may overlap a bit. In a perfect world, we would be able to conduct our cleanup of your property immediately, in such a way that it makes any work you must do as easy as possible, and of course, safe. This is generally not possible. Not to take away from your situation, but there are hundreds of properties in Libby that have similar circumstances as yours (e.g. for example children present and visible vermiculite in the yard). We cannot possibly clean them all up immediately. At this point, we are trying to systematically identify and target cleanups based on risk, location, amount and type of contamination, and other factors. This process involves, among other steps, screening (which occurred this past summer, including your property), more detailed sampling if necessary, and design work (developing the specifics of a cleanup plan for each property). Applying this process in an efficient manner to thousands of properties will take time, and until it unfolds, I cannot tell everyone exactly what will occur at



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their property and exactly when it will occur. We will only be able to cleanup a few hundred properties per year, and there will likely be over 1000 properties requiring cleanup before we are done. We are currently developing our cleanup list for 2003 with the information that we already have, and continue to work on getting the information we need to make decisions on all properties in the Libby area. Here are the best answers to your questions that I can provide at this point.

1. **What cleanup does EPA feel is required for this particular situation, and how and when will it be conducted?** Each property in Libby is unique. While EPA will try to be as consistent as possible in our cleanup approach from property to property, there will be many property-specific decisions that will have to be made. In general, we will remove surface soil with high levels of visible vermiculite, such as is the case around your home. Right now, over 1000 properties have been identified with some level of visible vermiculite. With regards to vermiculite below houses and in basements, we will make property specific decisions on how best to deal with the material. In some cases we will remove it, in some cases we will encapsulate it (such as below concrete or shotcrete), and in some cases we may leave it as is. These decisions will be made primarily based on likelihood of exposure and costs. We are currently developing our "standard approaches" as we start our systematic cleanup of Libby properties.
2. **What are the health risks of working in vermiculite/asbestos prior to cleanup and how can I address them?** Working in and around vermiculite certainly can present a health risk. It is impossible to for me, or anyone, to say exactly what risk your past and current activities may have caused. Based on what we do know, we encourage people to avoid any disturbance of the material and to wait until EPA performs cleanup to undertake activities which will require disturbance of the material. However, there are many situations where this is impractical or impossible. Given that many other residents may face a similar situation to you, I recently put together a short guidance memo for working in and around vermiculite that will be available to anyone who needs it. I've attached the current *draft* (I still need some folks to review it). This guidance gives a few practical tips for making any work as safe as possible, and for complying with applicable asbestos laws as well.

I will be in Libby the week of January 6, 2003. If this letter does not answer your questions, I encourage you to call the EPA Information Center and set up an appointment with me so we can speak directly. I can better explain our thought processes and the challenges we face in identifying and targeting properties for cleanup. You can also contact me directly in Denver at 1-800-227-8917, x6748. Thank you for your patience and understanding.

Sincerely,



Jim Christiansen
Remedial Project Manager



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December 27, 2002 - DRAFT

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To Whom it May Concern:

This memo is provide general guidance to homeowners, general contractors, or others in the Libby area that are contemplating working in or around areas known or suspected to contain vermiculite materials, such as vermiculite insulation. Examples of such work include accessing or working in attics (such as installing electrical wiring), cutting into or disturbing walls or subfloors that may contain insulation (such as remodeling), or disturbing soils known to contain vermiculite. Such work may occur either prior to EPA cleanup of a property, or in some instances, after an EPA cleanup has taken place. In some circumstances EPA may choose to leave insulation or other asbestos containing materials in place if the material is well contained and removal would be cost prohibitive or unnecessarily disruptive. You will know if this is the case when cleanup is complete at your property. Also, in some cases, it is possible that EPA will miss something that will be discovered later.

1. EPA strongly recommends that any vermiculite insulation or materials be left alone and not disturbed. If undisturbed and well contained, insulation poses minimal or no risk to an occupant of a building. However, if disturbed, even for short durations, unacceptable exposure may occur. If it is possible to delay work until EPA cleanup is complete (even removing boxes from the attic), this is preferable.
2. EPA strongly recommends that any work be done by trained, licensed asbestos professionals. In some circumstances this is required. However, it is not against the law for a homeowner to conduct work at a residential property. EPA recognizes that in some situations this may be necessary or preferable. If you are contemplating work in your home during which you may disturb or remove vermiculite insulation or other asbestos containing materials, either by yourself or through contractors, we highly recommend you contact the Montana Department of Environmental Quality Asbestos Control Program first (406-444-3490). The MDEQ can provide guidance on permitting and licensing requirements for your particular situation and provide practical information which may help make the work safer.
3. If a person who is not an asbestos professional conducts work or otherwise must disturb areas known or suspected to contain vermiculite insulation or other asbestos containing materials, then a few simple steps can greatly reduce or eliminate any potential exposure:



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- Minimize disturbance of the material. For instance, placing plastic sheeting over the material in an attic while working and minimizing time spent in the attic. Avoid spreading materials to other areas.
- Access attics in ways that minimize or eliminate release of vermiculite into the home, such as through an outside access.
- Avoid storage of material in the attic. If material must be stored, enclosing the material in garbage bags and opening them outside the home can help avoid contaminating the material of interest and tracking asbestos into the home.
- Use a respirator that contains a High Efficiency Particulate Arresting (HEPA) filter. Simple cotton dust filters are not effective for asbestos. This is probably the single most important step to reduce or eliminate exposures.
- If possible, keep the working area damp to prevent dust from being suspended into the air.
- Waste material generated may require disposal in a certified asbestos landfill. There are also licensing and permitting requirements for transportation and disposal of waste. Lincoln County is currently being equipped to accept asbestos containing material and can provide guidance on specific requirements.
- When work is completed, we recommend the area be vacuumed using a HEPA filter equipped vacuum cleaner and/or wiped down with a wet cloth. Vacuuming with a regular vacuum cleaner may only help to spread any contaminated dust.

4. Lastly, if you have any questions, such as you are unsure if an area is contaminated or are unable to determine if the insulation is vermiculite, contact the EPA Information Center in Libby at (406) 293-6194.

10/11/02-

Wendy Thami, Tommy Cook, Courtney Zamora
visited 610 Dakota Ave. met w/ property owner
Dean Costlow. Mr. Costlow expressed concern
about presence of vermiculite in "basement." The basement
is a dirt floor. The resident is tunneling under the
house in order to fix plumbing, electrical, & foundation.
The resident is concerned about the health risks
associated w/ working with vermiculite-containing soil.
The resident is also bringing the material removed
from the basement out to the yard to fill in holes.
We informed him that we have "priority removals" that
we are currently working on, and his home will be
addressed during the Superfund removals.

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TO PROJECT MANAGER LIBBY PAUL PERONARD

PLEASE RESPOND.

I HAVE CONERNS ON VERMICULITE UNDER AND AROUND MY HOME
ITS VITAL I WORK UNDER MY HOME.

PLEASE A CONTRACTOR NEEDS TO TELL ME WHAT WILL BE DONE

THANK YOU

DEAN H COSTLOW
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